

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
(Bid Protest)**

**AUGUST SCHELL ENTERPRISES,)
INC.)**

Plaintiff,)

V.)

**THE UNITED STATES)
OF AMERICA,)**

**Defendant.)
_____)**

Case No. 24-1972 C

Judge: _____

PLAINTIFF’S RULE 40.2 NOTICE OF DIRECTLY RELATED CASES

Pursuant to Rule 40.2 of the Rules of the Court of Federal Claims, Plaintiff, August Schell, Inc. (“August Schell” or “ASE”) hereby provides this Notice of Directly Related Cases. Plaintiff’s protest relates to Solicitation No. 70RTAC21R000000003 (the “Solicitation”) issued by the U.S. Department of Homeland Security (the “Agency”).

On September 20, 2024, Plaintiff filed a protest at the Government Accountability Office (“GAO”) regarding the Solicitation. The protest was docketed at File No. B-419893.32. The Agency notified the GAO that related protests of the Solicitation had been filed with this Court and requested that the GOA dismiss Plaintiff’s protest. Based upon this notice and the related cases filed with this Court, Plaintiff withdrew its protest and is now refile with this Court.

On September 26, protests regarding this Solicitation were filed in this Court by plaintiffs Westwind Partners, LLP (24-1504); V3Gate Partners, LLC (24-1505); and Solaris Colorado, LLC (24-1508).

Additional likely related protests have been filed by ENDevelopment, LLC (24-1529); NCS Technologies, Inc. (24-1543); Blue Tech Inc. (24-1552); Govsmart, Inc. (24-1596); RavenTek Alliance, LLC (24-1599); Thundercat Technology, LLC (24-1612); CounterTrade Products, Inc. (24-1624); ATP Gov, LLC (24-1633); MA Federal, Inc. (24-1653); Slam Technical Services, Inc. (24-1677); Braxton-Grant Technologies, Inc. (24-1678); Strategic Communications, LLC (24-1749); IGS Strategy JV, LLC (24-1750); New Tech Solutions, Inc. (24-1764); DH Technologies, Inc. (24-1802); DH Concepts Group, LLC (24-1803); and FedStore Corporation (24-1833).

The above referenced cases have been consolidated at Case No. 24-1504-EHM.

Date: December 1, 2024

Respectfully submitted,

/s/Kathy C. Potter
Kathy C. Potter
Potter & Murdock, P.C.
1015 15th Street, N.W., Sixth Floor
Washington, D.C. 20005
kpotter@pottermurdock.com
703-795-5296

Counsel of Record for August Schell Enterprises, Inc.

Of Counsel:

John M. Murdock
Sharon A. Roach
Potter & Murdock, P.C.
252 North Washington Street
Falls Church, VA 22042
(703) 992-9255
jmurdock@pottermurdock.com
sroach@pottermurdock.com

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of December 2024, I caused a true and correct copy of the foregoing MOTION FOR LEAVE TO FILE UNDER SEAL to be sent by the delivery method indicated below to the following:

United States Department of Justice (via e-mail)
Commercial Litigation Branch
1100 L Street, NW, 8th Floor
Washington, DC 20530
E-Mail: nationalcourts.bidprotest@usdoj.gov